

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN  
DISTRICT OF WEST VIRGINIA**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
vs.	)	Case No. 2:22-CR-00163
	)	
DAVID GERALD MINKKINEN	)	
and SIVARAMAN SAMBASIVAN,	)	
	)	
Defendants.	)	

**DEFENDANT MINKKINEN'S MOTION FOR PERMISSION TO TRAVEL**

COMES NOW Defendant Minkkinen and hereby files this Motion for Permission to Travel, stating as follows:

1. Defendant David Gerald Minkkinen is a married man. He and his wife have one child, a daughter who resides with them. His daughter is a senior in high school in Minnesota and has her approaching graduation and then will be attending college. His daughter, her friends, and their families have planned a trip to Punta Cana, Dominican Republic during the week of March 27, 2025, through April 3, 2025. The family will be flying roundtrip on Delta Airlines.
2. As a requirement of the Order Setting Conditions of Release entered on September 15, 2022, the defendant was required to surrender his passport to the United States Probation Office.
3. By order entered December 21, 2023, this court previously permitted Defendant Minkkinen to accompany his wife and daughter on her junior class trip on a cruise ship to the U.S. Virgin Islands and Puerto Rico without incident. In that order, because it was a cruise ship rather than a passenger flight, the court allowed

Defendant Minkkinen to travel outside of the continental United States but did not allow him to disembark the ship at a foreign port.

4. The Defendant is a lifelong resident of the state of Minnesota and owns a home there. The defendant has strong family ties to Minnesota. Defendant has never lived outside of the United States.
5. Defendant is not a flight risk. He has fully complied with all his pre-trial release requirements and appeared at every required hearing. The defendant abided by all terms of the previous order allowing foreign travel.
6. In an email request to the U.S. Attorney's Office regarding its consent for the Defendant to take this family trip, the government indicated it would oppose such travel privileges. The government has offered no evidence that Mr. Minkkinen is a flight risk and no evidence that Mr. Minkkinen poses any danger whatsoever to the community of committing additional 18 U.S.C. 1001 violations (the only charges remaining against him).
7. Not only has Defendant Minkkinen been fully compliant with all bond conditions during the lengthy pendency of this case, he has had the freedom to travel throughout the continental United States throughout the pendency of his case; had the freedom and means to travel internationally until the indictment was returned; and, although he was aware of the investigation and possible pending federal indictment, he did not flee in the years before his indictment. The government will be unable to offer any clear rationale for opposing this request.

WHEREFORE, Defendant David Gerald Minkkinen respectfully requests entry of an order modifying his conditions of release to permit his travel with his family to Punta Cana, Dominican Republic during the week of March 27, 2025, through April 3, 2025, via Delta Airlines, as well as for access to his passport.

By: /s/ Michael Edward Nogay  
Michael Edward Nogay (WV ID 2744)  
Counsel for Defendant Minkkinen

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By: /s/ Stephen S. Stallings.  
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**CERTIFICATE OF SERVICE**

I, Michael Edward Nogay, counsel for Defendant David Gerald Minkkinen, hereby certify that on this 12th day of February, 2025, I served a copy of **DEFENDANT MINKKINEN'S MOTION FOR PERMISSION TO ALLOW TRAVEL** by filing the same with the Court using the CM/ECF system.

By: /s/ Michael Edward Nogay  
Michael Edward Nogay (WV #2744)  
Counsel for Defendant

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